

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**Brendon J. Lydon**

U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
**CIVIL ACTION**

**V.**

**NO.** \_\_\_\_\_

**Local 103, International  
Brotherhood of Electrical Workers**

**COMPLAINT**

**Parties**

- 1. The Plaintiff, Brendon J. Lydon, is a resident of Quincy, Norfolk County, Massachusetts and a citizen of the United States.**
- 2. The Defendant, Local 103, International Brotherhood of Electrical Workers, is a resident of Dorchester, Suffolk County, Massachusetts and a citizen of the United States.**

**Jurisdiction**

- 3. This court has jurisdiction over this matter pursuant to 28 U.S.C. Sub-Section 1332.**

**Facts**

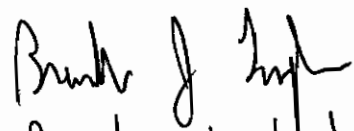
- 4. Local 103, IBEW is an exclusive hiring hall and has a standard set of dispatch rules which govern the referral procedure in which applicants receive employment.**
- 5. These set of rules are mandated by its parent organization, known as the International Office.**

- 6. This language is known as Category I language and is to be inserted in every IBEW local union's Collective Bargaining Agreement verbatim.**
- 7. On, or around, August 30<sup>th</sup> 2011, Local 103 ratified a new contract.**
- 8. I assert that the current Business Manager, along with President John Dumas and the Negotiating Committee, knowingly negotiated referral language which is in conflict with the IBEW International Office's mandated Category I language, which I feel breaches its Duty of Fair Representation.**
- 9. The language in conflict is stated on a document called Memorandums of Understanding, as well as posted Referral Guidelines (which also contains language conflicting with Local 103's Workplace Safety Program).**
- 10. All my requests to Local 103, IBEW for information pertaining to the current contract/referral language have been ignored.**

11. I am seeking for Local 103, IBEW to cease violating my rights with their current hiring hall violations, as well as any compensation deemed necessary to make me whole, due to financial harm caused to me by their dishonest and perfunctory actions, in regards to negotiating in bad faith, as well as putting into action a discriminatory & unfair hiring hall referral system.

12. WHEREFORE, the Plaintiff demands judgement against the defendants for damages and such other relief as this Court deems just.

13. The Plaintiff demands a trial by jury.

Signature:   
Name : Brendon J. Lydon  
Address : 321 Fayette St.  
Quincy, MA 02170  
Telephone #: (617) 285-4338